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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

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9 UNITED STATES OF AMERICA,  
10  
11 Plaintiff,  
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13 v.  
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15 BRENDA CONTRERAS,  
16  
17 Defendant.

Case No. 2:21-cr-00102-JCM-VCF

**STIPULATION TO CONTINUE  
BRIEFING OF PRETRIAL MOTIONS**

(First Request)

15 **IT IS HEREBY STIPULATED AND AGREED**, by and between Jason M. Frierson,  
16 United States Attorney, Allison Reese, Assistant United States Attorney, Lisa Cartier-Giroux,  
17 counsel for the United States of America; and Maysoun Fletcher, Esq., and Jess Marchese, Esq.,  
18 counsel for Brenda Contreras, that the additional briefing ordered by Magistrate Judge Ferenbach  
19 following the evidentiary hearing which took place on May 6, 2022 [ECF No. 126] related to  
20 Defendant's Motion to Suppress Statements ([ECF No. 103], Government's Response [ECF No.  
21 118], and Defendant's Reply [ECF No. 121]) and Defendant's Motion to Suppress Evidence  
22 Unlawfully Seized from Motel Room ([ECF No. 104], Government's Response [ECF No. 117],  
23 and Defendant's Reply [ECF No. 120]) should be continued as follows:

24 Defendant's opening brief currently due May 20, 2022, should be continued to June 17,  
25 2022.

26 United States' answering brief currently due June 3, 2022, should be continued to July 1,

2022.

Defendant's reply brief currently due June 13, 2022, should be continued to July 11, 2022.

This stipulation is entered into for the following reasons:

1. The parties need additional time to attempt to resolve this matter.
2. The parties need additional time to research and prepare their briefs.
3. The parties stipulated to continue trial [ECF No. 128] which will allow the additional time requested herein for briefing.
4. The parties further agree that the circumstances presented above are factors for delay under Sections 3161(h)(7)(B)(i) through (iv), and 3161(h)(1)(D) and that all delay resulting from any continuance granted pursuant to this Stipulation is excluded from the computation of time by which trial must commence under the statute of limitations by virtue of Title 18, United States Code, Section 3161 (h)(7)(A), the ends of justice outweighing the interests of the public and the defendant in a speedy trial when considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) through (iv).
5. This is the first request for continuance.

DATED this 13th day of May, 2022.

Respectfully submitted,

JASON M. FRIERSON,  
United States Attorney

/s/ Allison Reese  
ALLISON REESE  
Assistant United States Attorney

/s/ Maysoun Fletcher, Esq.  
MAYSOUN FLETCHER, ESQ.  
Counsel for Brenda Contreras

/s/ Lisa Cartier-Giroux  
LISA CARTIER-GIROUX  
Assistant United States Attorney

/s/ Jess Marchese, Esq.  
JESS MARCHESE, ESQ.  
Counsel for Brenda Contreras

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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9 UNITED STATES OF AMERICA,  
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11 Plaintiff,  
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15 BRENDA CONTRERAS,  
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17 Defendant.

Case No. 2:21-cr-00102-JCM-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

**FINDINGS OF FACTS**

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16 Based upon the pending stipulation of the parties, and good cause appearing therefore, the  
17 Court finds that:

- 18 1. Defendant's opening brief currently due May 20, 2022, should be continued to June  
19 17, 2022.
- 20 2. United States' answering brief currently due June 3, 2022, should be continued to  
21 July 1, 2022.
- 22 3. Defendant's reply brief currently due June 13, 2022, should be continued to July 11,  
23 2022.
- 24 4. The parties need additional time to attempt to resolve this matter.
- 25 5. The parties need additional time research and prepare their briefs.
- 26

6. The parties stipulated to continue trial [ECF No. 128] which will allow the additional time requested herein for briefing.

7. The parties further agree that the circumstances presented above are factors for delay under Sections 3161(h)(7)(B)(i) through (iv), and 3161(h)(1)(D) and that all delay resulting from any continuance granted pursuant to this Stipulation is excluded from the computation of time by which trial must commence under the statute of limitations by virtue of Title 18, United States Code, Section 3161 (h)(7)(A), the ends of justice outweighing the interests of the public and the defendant in a speedy trial when considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) through (iv).

## CONCLUSIONS OF LAW

1. Denial of this request for continuance would likely result in a miscarriage of justice;

2. For all of the above-stated facts, the Court finds that the ends of justice outweigh the interests of the public and the defendant in a speedy trial when considering the factors under 18 U.S.C. §3161(h)(7)(B)(i) and (iv). As a result, any and all delay resulting from the date of entry of this Order until the date set for trial below, is excludable from the computation of time by which trial must commence under the Speedy Trial Act by virtue of 18 U.S.C. §3161(h)(7)(A).

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**ORDER**

**IT IS THEREFORE ORDERED** that the Defendant's opening brief currently due May 20, 2022, shall be continued to June 17, 2022.

**IT IS FURTHER ORDERED** that the United States' answering brief currently due June 3, 2022, shall be continued to July 1, 2022.

**IT IS FURTHER ORDERED** that the Defendant's reply brief currently due June 13, 2022, shall be continued to July 11, 2022.

Dated this 13th day of May, 2022.

  
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HONORABLE CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE